# IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: : Bankruptcy No. 20-13619-ELF

Waldo Alfaro d/b/a All Decorative Concrete, : Chapter 13

LLC d/b/a Smart Remodeling Solutions, LLC and : Rositsa Manolcheva d/b/a Rositsa Alfaro d/b/a :

All Decorative Concrete, LLC :

Debtors

Legacy Mortgage Asset Trust 2020-GS1 c/o Rushmore Loan Management Services, LLC

Movant

VS.

Waldo Alfaro d/b/a All Decorative Concrete, : LLC d/b/a Smart Remodeling Solutions, LLC and : Rositsa Manolcheva d/b/a Rositsa Alfaro d/b/a : All Decorative Concrete, LLC :

Debtor/Respondent

and

William C. Miller, Esquire :

Trustee/Respondent :

### PRAECIPE TO WITHDRAW OBJECTION TO CONFIRMATION OF THE PLAN

#### TO THE CLERK:

Please mark the Objection to Confirmation of the Plan, filed on November 04, 2020 as Doc. #24, as withdrawn without prejudice.

Respectfully submitted,

/s / Antonio Bonanni, Esquire
Antonio, Bonanni, Esquire
Hladik, Onorato & Federman, LLP
Attorney I.D. # 322940
298 Wissahickon Avenue
North Wales, PA 19454
Phone 215-855-9521

Email: abonanni@hoflawgroup.com

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Debtor/Respondent

and

William C. Miller, Esquire

Trustee/Respondent

### **CERTIFICATE OF MAILING**

I, Antonio Bonanni, certify under penalty of perjury that I served a copy of the Praecipe to Withdraw the Objection to Confirmation of the Plan to the parties at the addresses shown below on February 16, 2021.

The types of service made on parties were: Electronic Notification and First Class Mail:

Carol B. McCullough., Esquire Waldo Alfaro

Via Electronic Filing

Attorney for Debtors

Rositsa Manolcheva
675 Eagle Road
Newtown, PA 18940

William C. Miller, Esquire

Via First Class Mail

Via Electronic Filing Debtors

Trustee

/s / Antonio Bonanni, Esquire

Antonio, Bonanni, Esquire

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